

SLR:DCL:MMO  
F. # 2017R01935

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

-against-

Cr. No. 17-0614 (S-1)(SJF)

DIJON TOONE,  
also known as “Ace,”

Defendant.

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The United States of America, by and through Richard P. Donoghue, United States Attorney for the Eastern District of New York, Madeline O’Connor, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property pursuant to Fed. R. Crim. P. Rule 7(f).

The above-captioned Superseding Indictment seeks forfeiture of property pursuant to Title 21, United States Code, Sections 853(a) and 853(p) in connection with Counts One and Three, and 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Sections 2461(c) in connection with Counts Two, Four and Five. The United States hereby gives notice that, in addition to the forfeiture allegations in the above-captioned Superseding Indictment, the United States is seeking forfeiture of the following property as to Counts One and Three of the Superseding Indictment:

Two thousand six hundred twenty-five dollars and no  
cents (\$2,625.00) in United States currency seized from  
the defendant in or around November 2017, in Manorville,

New York.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Central Islip, New York  
May 25, 2018

RICHARD P. DONOGHUE  
United States Attorney  
Eastern District of New York  
610 Federal Plaza East  
Central Islip, New York 11722

By: /s/ Madeline O'Connor  
Madeline O'Connor  
Assistant United States Attorney  
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